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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA MANDUJANO SANCHEZ,

Defendant.

CASE NO. 2:21-cr-00328-GMN-DJA

**STIPULATION AND PROPOSED ORDER  
TO CONTINUE SENTENCING DATE  
FOR CONSOLIDATED CASE**

Maria Mandujano Sanchez, by and through counsel of record Michael Anthony Hernandez, Jacqueline Tirinnanzi and Kathleen Bliss, and the United States of America, by and through Assistant United States Attorney Allison Reese, hereby stipulate and request that the Court vacate Ms. Mandujano Sanchez's sentencing hearing currently set October 19, 2022, at 10:00 a.m. and continue it to a later date convenient to the Court, but no sooner than ninety (90) days, so that sentencing may be consolidated with the portion of the case that was recently consolidated from 2:21-cr-00226-JCM-NJK into the instant case (resolution is pending). ECF

No. 22. This stipulation is made and based upon the following:

1. The parties agree to the continuance.
2. On March 2, 2022, Ms. Mandujano Sanchez pleaded guilty to one count of Importation of a Controlled Substance (cocaine) in violation of 21 U.S.C. §§ 952 and 960. ECF No. 15.
3. Defense counsel’s ability to effectively and thoroughly explore all factors relevant to Ms. Mandujano Sanchez’s mitigation and sentencing presentation requires additional time to prepare.
4. Furthermore, on June 27, 2022, as the result of an unopposed motion (ECF No. 21), this Court issued an order granting the consolidation of the matter in Case No. 2:21-cr-00226-JCM-NJK into the instant case. Case No. 2:21-00226-JCM-NJK, ECF No. 68 and Case No. 2:21-cr-00328-GMN-DJA-1, ECF No. 22. Resolution is pending<sup>1</sup> for the consolidated portion of the case, with the objective of handling sentencing for both matters simultaneously, for efficiency’s sake.
5. The additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that, “the court may, for good cause, change any time limits prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does not implicate or undermine the defendant’s speedy trial rights under the United States Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).
6. This is the third request for a continuance of the sentencing. The additional time requested herein is not sought for purposes of delay. No further continuances are anticipated.
7. Denial of this request for a continuance would deny counsel for Ms. Mandujano Sanchez

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<sup>1</sup> Resolution was delayed in part due to trial counsel participating in a trial in Reno in September. *See* Case No. 3:21-00010-MMD-CLB.

1 sufficient time to effectively and thoroughly prepare for sentencing, taking into account  
2 due diligence. Accordingly, a denial of this request for continuance could result in a  
3 miscarriage of justice.

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5 8. Ms. Mandujano Sanchez is in custody and agrees to the proposed continuance.

6  
7 Dated October 13, 2022.

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9  
10 /s/ Allison Reese

11 ALLISON REESE, ESQ.  
Assistant U.S. Attorney

/s/ Michael Anthony Hernandez

MICHAEL ANTHONY HERNANDEZ, ESQ.  
Counsel for Maria Mandujano Sanchez

12 /s/ Jacqueline Tirinnanzi

13 JACQUELINE TIRINNANZI, ESQ.  
Counsel for Maria Mandujano Sanchez

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA MANDUJANO SANCHEZ,

Defendant.

CASE NO. 2:21-cr-00328-GMN-DJA

**STIPULATION AND PROPOSED ORDER  
TO CONTINUE SENTENCING DATE  
FOR CONSOLIDATED CASE**

**FINDINGS OF FACT**

Maria Mandujano Sanchez, by and through counsel of record Michael Anthony Hernandez, Jacqueline Tirinnanzi and Kathleen Bliss, and the United States of America, by and through Assistant United States Attorney Allison Reese, hereby stipulate and request that the Court vacate Ms. Mandujano Sanchez's sentencing hearing currently set October 19, 2022, at 10:00 a.m. and continue it to a later date convenient to the Court, but no sooner than ninety (90) days, so that sentencing may be consolidated with the portion of the case that was recently consolidated from 2:21-cr-00226-JCM-NJK into the instant case (resolution is pending). ECF No. 22. This stipulation is made and based upon the following:

1. The parties agree to the continuance.
2. On March 2, 2022, Ms. Mandujano Sanchez pleaded guilty to one count of Importation of a Controlled Substance (cocaine) in violation of 21 U.S.C. §§ 952 and 960. ECF No. 15.
3. Defense counsel's ability to effectively and thoroughly explore all factors relevant to Ms. Mandujano Sanchez's mitigation and sentencing presentation requires additional time to prepare.

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4. Furthermore, on June 27, 2022, as the result of an unopposed motion (ECF No. 21), this Court issued an order granting the consolidation of the matter in Case No. 2:21-cr-00226-JCM-NJK into the instant case. Case No. 2:21-00226-JCM-NJK, ECF No. 68 and Case No. 2:21-cr-00328-GMN-DJA-1, ECF No. 22. Resolution is pending<sup>2</sup> for the consolidated portion of the case, with the objective of handling sentencing for both matters simultaneously, for efficiency’s sake.
5. The additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that, “the court may, for good cause, change any time limits prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does not implicate or undermine the defendant’s speedy trial rights under the United States Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).
6. This is the third request for a continuance of the sentencing. The additional time requested herein is not sought for purposes of delay. No further continuances are anticipated.
7. Denial of this request for a continuance would deny counsel for Ms. Mandujano Sanchez sufficient time to effectively and thoroughly prepare for sentencing, taking into account due diligence. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.
8. Ms. Mandujano Sanchez is in custody and agrees to the proposed continuance.

### **CONCLUSION OF LAW**

For all the above-stated reasons, the ends of justice are served by granting the requested continuance for the following reasons: Additional time requested by this stipulation is reasonable

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<sup>2</sup> Resolution was delayed in part due to trial counsel participating in a trial in Reno in September. *See* Case No. 3:21-00010-MMD-CLB.

1 pursuant to Fed. R. Crim. P. 32(b)(2), which states that the “court may, for good cause, change  
2 any time limits prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does  
3 not implicate or undermine the defendant’s speedy trial rights under the United States  
4 Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016). Failure to grant the  
5 continuance would deny parties sufficient time to meaningfully continue to prepare for  
6 sentencing, considering the exercise of due diligence.  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

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MARIA MANDUJANO SANCHEZ,

Defendant.

CASE NO. 2:21-cr-00328-GMN-DJA

**PROPOSED ORDER TO CONTINUE  
SENTENCING DATE FOR  
CONSOLIDATED CASE**

Based upon the stipulation of the parties, and good cause appearing, it is hereby ORDERED that Ms. Mandujano Sanchez's sentencing hearing set for October 19, 2022, hereby is, VACATED.

IT IS FURTHER ORDERED that the sentencing hearing is reset for January 17, 2023, at the hour of 10 AM in courtroom 7D.

Dated this 13 day of Oct. 2022.

  
\_\_\_\_\_  
THE HONORABLE GLORIA M. NAVARRO  
UNITED STATES DISTRICT JUDGE

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